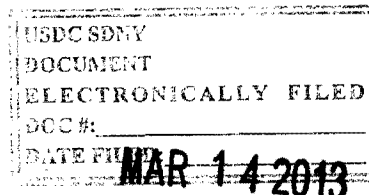


LAW OFFICES OF
GERALD B. LEFCOURT, P.C.
A PROFESSIONAL CORPORATION
149 EAST 78TH STREET
NEW YORK, NEW YORK 10075



GERALD B. LEFCOURT
lefcourt@lefcourtllaw.com

TELEPHONE
(212) 737-0400
FACSIMILE
(212) 988-6192

SHERYL E. REICH
reich@lefcourtllaw.com
RENATO C. STABILE
stabile@lefcourtllaw.com
FAITH A. FRIEDMAN
friedman@lefcourtllaw.com

March 11, 2013

VIA FAX

Honorable J. Paul Oetken
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

APPLICATION GRANTED:

HON. J. PAUL OETKEN
UNITED STATES DISTRICT JUDGE 3/13/13

Re: United States v. Zemlyansky, et al., 12-CR-00171 (JPO)

Dear Judge Oetken:

We are the attorneys for Michael Morgan, a defendant in the above-referenced matter. With the consent of the government and Pre-Trial Services, we write to request modification of Dr. Morgan's pretrial travel restrictions, which currently restrict Dr. Morgan's travel to the Southern and Eastern Districts of New York. We request that Dr. Morgan's travel restrictions be expanded to include the District of New Jersey. The reason for the request is for Dr. Morgan to pursue employment and business opportunities in New Jersey and not burden the Court and the government with frequent individual travel requests. We have communicated with Assistant United States Attorney Daniel Goldman, who advises that the government has no objection to this request. We have also communicated with Dr. Morgan's Pre-Trial Services Officer, Jeffrey Steimel, who advises that Pre-Trial Services has no objection to this request.

We thank the Court for its consideration.

Respectfully submitted,

Renato C. Stabile

cc: AUSA Daniel Goldman
Jeffrey Steimel, Pretrial Services
(both via email)